REMARKS/ARGUMENTS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1-15 are presently active in this application. Claims 1, 4, 10, 13 and 14 having been amended by the present amendment, Claims 16-20 having been withdrawn from consideration as directed to a non-elected invention.

In the outstanding Office Action Claims 4-9, 10, 14 and 15 were rejected under 35 USC §112, second paragraph as being indefinite; Claims 1-6, 10, 11, 14 ands 15 were rejected under 35 USC §102(e) as being anticipated by Okubora (US 6,504,096) and Claims 12 and 13 were rejected under 35 USC §103(a) as being unpatentable over Okubora

In response to the rejection under 35 U.S.C. §112, the informalities identified have been corrected herewith. Accordingly, this ground for rejection is believed to have been overcome. No new matter has been added.

In response to the rejections under 35 U.S.C. §102(e) and §103(a), Claim 1 has been amended to clarify the claimed invention. To that end, amended Claim 1 recites, inter alia, "... a circuit board having a top surface larger than areas of the first and second main surfaces of said module substrate so that said module substrate is mounted on a localized portion of the top surface and a bottom surface facing with the top surface; [and] a plurality of board-cite interconnects disposed on the top surface of the circuit board, each being connected to one of said joints in the localized portion of top surface and extending from the localized portion to an outer area on the top surface;" By virtue of this language, Claim 1 has been clarified to clearly distinguish between the claimed module substrate and the claimed circuit board. No new matter has been added.

Okubora provides no disclosure or suggestion regarding the claimed combination of a module substrate, a plurality of substrate-cite interconnects, a semiconductor chip, a plurality of joints, a circuit board, a plurality of board-cite interconnects and a first heat conductive material. Then, it is believed clear that Okubora fails to show the claimed circuit board having a top surface larger than areas of the first and second main surfaces of said module substrate so that said module substrate is mounted on a localized portion of the top surface and a bottom surface facing with the top surface. By this definition of the claimed circuit board, the claimed module substrate is also defined such that the claimed module substrate serves as an interposer, which interposes between the claimed substrate-cite interconnect and the claimed board-cite interconnect, by electrically connecting the claimed substrate-cite interconnect with the claimed board-cite interconnect.

Thus, it is evident that the <u>Okubora</u> metal plate 16 does not correspond to the claimed circuit board and that the <u>Okubora</u> mother board (package board or mounting board) 2 does not correspond to the claimed module substrate, because the mother board 2 is larger than the metal plate 16, as clearly disclosed in <u>Okubora</u>'s FIG. 1.

Furthermore, Okubora is silent about the claimed board-cite interconnect disposed on the top surface of the circuit board, being connected to one of said joints in the localized portion of top surface and extends from the localized portion to an outer area on the top surface.

Therefore, it is respectfully submitted that the <u>Okubora</u> device substantially differs from the claimed structure and that the amended claims patentably define thereover. Since <u>Anderson</u> fails to cure the deficiencies of <u>Okubora</u>, it is respectfully submitted that the pending amended claims patentably define over the cited art.

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Accordingly, in light of the above discussion and in view of the present amendment, it is respectfully submitted that Claims 2-15 are in condition for allowance, and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

Eckhard H. Kuesters

Registration No. 28,870

Attorney of Record

OBLON, SPIVAK, McCLELLAND,

MAJER & NEUSTADT, P.C.

Customer Number 22850

Tel: (703) 413-3000 Fax: (703) 413 -2220 (OSMMN 06/04)

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